Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems	)	CC Docket No. 94-102
	)	
Wireless E911 Phase II Implementation Plan of Nextel Communications, Inc. and Nextel Partners, Inc.	)	

NEXTEL PARTNERS, INC.
PHASE II E911 QUARTERLY REPORT
AUGUST 1, 2002

To: Chief, Enforcement Bureau
Chief, Wireless Telecommunications Bureau

INTRODUCTION

Pursuant to the October 12, 2001 Order of the Federal Communications Commission ("Commission") in CC Docket No. 94-102,[1] Nextel Partners, Inc. ("Nextel Partners") respectfully submits this Enhanced 911 ("E911") Quarterly Report on Nextel Partners' Phase I and Phase II E911 deployment/implementation progress. Herein, Nextel Partners provides an update on all relevant events impacting the network infrastructure and handset upgrades necessary to enable Phase II E911 location capabilities as well as a listing of all pending requests for Phase I and Phase II E911 service and the status of each request. Nextel Partners does not have benchmark dates on which to report since its first Phase II E911 requirement, to begin selling an Assisted Global Position System ("A-GPS") handset, occurs on October 1, 2002. Nextel Partners,

[1] *In the Matter of Revision of the Commission's Rules To Ensure Compatibility With Enhanced 911 Emergency Calling Systems, Wireless E911 Phase II Implementation Plan of Nextel Communications, Inc.,* Order, CC Docket No. 94-102, FCC 01-295, released October 12, 2001 ("Nextel Waiver Order").

however, is working closely with its iDEN technology vendor, Motorola, Inc. ("Motorola"), and continues to progress toward fulfilling its first Phase II E911 benchmark.

BACKGROUND

On November 9, 2000 Nextel Communications, Inc. ("Nextel Communications") and Nextel Partners (together referred to herein as "Nextel") requested a waiver of the Commission's Phase II E911 rules to permit the launch of a compliant Phase II E911 service on October 1, 2002, one year after the Commission's implementation deadline.[2] Because Nextel's Phase II E911 technology is a handset-based A-GPS solution, Nextel also sought relief from the Commission's handset penetration rates and associated benchmark dates. In the Nextel Waiver Order, the Commission granted Nextel's requested relief by imposing the following Phase II E911 implementation plan:

October 1, 2002:	Begin selling A-GPS-capable handsets;
December 31, 2002:	10% of all new handsets sold are A-GPS-capable;
December 1, 2003:	50% of all new handsets sold are A-GPS-capable;
December 1, 2004:	100% of all new handsets sold are A-GPS-capable;
December 31, 2005:	95% of all Nextel's entire iDEN customer base is A-GPS-capable.[3]

SUMMARY OF IMPLEMENTATION EFFORTS TO DATE

As the Commission is aware, Nextel and Motorola have been developing A-GPS capability in iDEN technology since Fourth Quarter 2000, prior to the Commission granting Nextel's waiver request. Unlike other wireless technologies and air interfaces,

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[2] *Nextel Communications, Inc. and Nextel Partners, Inc. Joint Report on Phase II Location Technology Implementation and Request for Waiver*, filed November 9, 2000 in CC Docket No. 94-102 (hereinafter "November 9 Waiver").

[3] *Id*. at para. 10.

iDEN handsets and infrastructure, which are Motorola proprietary technologies, did not have a readily available location capability to support Phase II E911 service.[4] Consequently, Motorola was forced to design, develop and integrate, from scratch, an A-GPS capability in the iDEN handsets and infrastructure.[5] The timeline set forth above required that Motorola's efforts commence as soon as possible to provide at least 24 months of development and testing time prior to commercial launch.

The initial stage of development required the addition of the A-GPS circuitry and antenna to the existing iDEN "baseband" radio since no chipset was (or is) available that permits integration of the A-GPS capability into the baseband of the handset.[6] By January 2001 – ten months before the Commission acted on Nextel's waiver request – Motorola had successfully added the A-GPS capability onto the baseband of an existing Nextel handset platform. By March 2001 the A-GPS capability had been developed in a prototype iDEN handset and by June 2001 (still months prior to a Commission decision on Nextel's waiver request), Nextel and Motorola had conducted a field test of the A-GPS capability in the prototype.[7]

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[4] As Nextel has noted previously in this proceeding, Motorola's iDEN technology is an "island" technology for Phase II E911 purposes.

[5] Nextel chose the A-GPS location technology, as it explained in the waiver proceeding, because it was the only technology ("available" or "unavailable") that met the Commission's location accuracy requirements. Thus, to comply with the accuracy requirements and to better assist public safety agencies in locating emergency callers on Nextel's system, Nextel asked its vendor to undertake this A-GPS development effort.

[6] The availability of a new chipset is critical to Nextel's ability to deploy the A-GPS capability across its handset lines. Adding the A-GPS capability to the existing handset platforms, as Nextel and Motorola are doing to meet the October 1, 2002 deadline, impacts form factor (i.e., size) and cost of the handset. Once the new chipsets are available – currently scheduled for Fourth Quarter 2003 – Motorola will have the capability to include the A-GPS capability in all of Nextel's handset models, including those with smaller form factors.

[7] This prototype test used a sub-set of the test locations in the Washington D.C. area where Nextel conducted its Second Quarter 2000 field trial of the varying location technologies. Nextel has described its Second Quarter 2000 technology trials in great detail. *See, e.g.,* Response of Nextel Communications, Inc.

Since June 2001 Motorola and Nextel have been engaged in ongoing testing of the prototype handset in Motorola's labs in Florida, using an A-GPS upgraded Enhanced Base Transceiver System ("EBTS") and Base Station Controller ("BSC") as well as a Global Locate server,[8] to replicate an A-GPS-ready iDEN network in the lab. In January 2002 Motorola personnel conducted a second field trial of the prototype handset (using the form factor that will be used for Nextel's October 1, 2002 A-GPS handset release) and alternative A-GPS antennae to compare and contrast the effectiveness of each antenna type.[9] The January 2002 trial tested Motorola's latest iteration of the A-GPS handset form factor and A-GPS software, and the results showed improvement in the overall performance of the prototype iDEN A-GPS capable handset. Similar to the earlier June 2001 field trial, this January trial did not include network assist data because the A-GPS network infrastructure upgrades were not yet available.

In late March 2002, Nextel and Motorola personnel used Alpha I versions of the A-GPS handset in the live network in Nextel's Baltimore/Washington market. Although the network assist data still was not available for this Alpha I test, Motorola generated important information about the handset's functionality in existing networks as well as performance in a non-assisted environment. The network assist infrastructure, which

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and Nextel Partners, Inc. To Order Of The Wireless Telecommunications Bureau, CC Docket No. 94-102, filed May 21, 2001; Reply Comments of Nextel Communications, Inc. to Further Comments of NENA, APCO and NASNA, CC Docket No. 94-102, filed July 30, 2001. Because Nextel and Motorola were testing a prototype handset in June 2001, no actual "phone calls" were placed. The phone was instructed by a laptop computer, to which it was tethered, to determine its location using the GPS antenna and circuitry in the prototype. For purposes of testing the prototype handset in a "real world situation," however, the prototype was held to the ear while the GPS information was being gathered by the handset.

[8] Global Locate's software assists transactions between iDEN handsets and GPS satellites by optimizing information delivery in relation to caller position, i.e., it narrows the number of GPS satellites the handset considers in calculating its location.

[9] Again, the test was conducted in the Washington, D.C. area using test points that Nextel previously had used in its Second Quarter 2000 technology field trial.

should improve the performance of the A-GPS capable handset by providing it additional location "assistance" data, primarily includes the Gateway Mobile Location Center ("GMLC") and the Serving Mobile Location Center ("SMLC"). The SMLC interfaces with the GPS reference receiver network and Nextel's Mobile Switching Center ("MSC") to provide assistance data to the handset. The GMLC then manages the interface between the MSC and the Public Safety Answering Point ("PSAP") to ensure that the location information is properly transmitted from Nextel's network to the PSAP's network.

As Nextel has explained to the Commission previously, achieving the October 1, 2002 deadline requires significant time, resources, effort and cooperation between Nextel and Motorola, as well as with Nextel's MSC vendor, Nortel. Nonetheless, as Nextel's efforts to date demonstrate, Nextel is committed to deploying an A-GPS capable handset and Phase II service on October 1, 2002 and will continue to work closely with Motorola to meet the milestones in the agreed upon schedule. Nextel has committed and will continue to commit substantial resources to deploy the infrastructure necessary to transmit Phase II location information to Phase II-ready PSAPs (that have timely requested Phase II service) by October 1, 2002. Since May 1, 2002, the date of the last Quarterly Report, Nextel has made notable progress toward achieving the October deadline.

Network Infrastructure and Testing

To support Phase II requirements, Nextel has installed new hardware and network upgrades to support required back office functionality and EBTS upgrades. Moreover, Nextel has implemented strict and aggressive internal deadlines to deploy hardware and

software on an abbreviated time schedule, as necessary to meet the October 1, 2002 benchmark.

By mid-June 2002 Nextel had completed installation of all network hardware, including but not limited to NT servers, Global Locate servers, SMLC/GMLC equipment, and additional upgrades to existing hardware, all necessary to enable operation of Phase II service. Soon thereafter Global Locate software was loaded on to Nextel's NT server. Additionally, Nextel loaded its network data on to the GMLC to facilitate the association of GPS satellites to Nextel's cell site locations, thereby enabling Nextel to deliver assist data to handsets. After all other necessary server software and data fills were loaded on to Nextel's network, end-to-end connectivity, including SS7 links and frame relay connections, was confirmed as well as verification that Nortel's equipment (i.e. the GMLC and SMLC) was operational. Integration testing of all of these network components validated network configurations. By early July Nextel had successfully transmitted over its network a simulated Phase II E911 call and in mid-July Nextel had completed satisfactory Acceptance Test Plan's ("ATPs") with Motorola, Nortel, Global Locate and Intrado, which provide a critical link between Nextel's Phase II network and the PSAPs.[10]

To provide Phase II E911 service, Nextel also needed to load new software, developed by Motorola, on its EBTSs and BSCs. Motorola conducted significant software testing in its laboratories during the spring and early summer before delivering the software to Nextel in June. Upon delivery of this software, Nextel commenced additional, limited testing in its own laboratories. No problems were detected so the

[10] An ATP is necessary to verify that vendors' individual components work by themselves, as well as with other components, and ATPs confirm end-to-end integration among all components.

software was loaded into the BSCs in Nextel's Washington D.C. and Virginia markets the last week of June. Soon after the software was loaded in the live network, a service problem was detected which impacted Nextel's commercial iDEN users.[11] Nextel immediately unloaded the software from the live network and within a week Motorola had identified the issue, developed a solution, tested a software "patch" in the laboratory and delivered the new software to Nextel. Nextel then loaded the software in the BSCs in the same markets and has not experienced further problems.[12]

In addition to the new Motorola software load, another critical component of Nextel's A-GPS solution is the inter-relationship among various timers operating in the handsets and network that control the receipt, delivery and transmission of data. Nextel can optimize all of these timers only by operating in actual or "near actual" environments. Thus, to characterize various PSAP operating environments, Nextel has been working with multiple vendors to replicate live call scenarios not only to optimize timer settings and data delivery, but also to verify end-to-end transmission of Phase II E911 calls in varying scenarios. Based on the results of these studies, Nextel is in the process of finalizing network and handset timer values to optimize data delivery to PSAPs through its iDEN network.[13]

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[11] Due to the potential gravity of this issue, Nextel verbally informed Blaise Scinto, Deputy Chief, Policy Division, in the Wireless Telecommunications Bureau via a telephone call the last week of June 2002.

[12] As stated previously, Nextel personnel are operating under an accelerated timeline to test, reconfigure and install hardware and software in less than half the time normally reserved for a project of such magnitude. Although internal deadlines were affected by the software problem discussed above, Nextel has initiated a mitigation plan to enable October 1st compliance and believes that achieving this benchmark will not be adversely impacted by this problem. However, should this software issue or any other hurdle arise that could jeopardize Nextel's ability to deploy Phase II on October 1, 2002, Nextel will inform the Commission immediately.

[13] For PSAPs that deploy Nextel's Phase II solution, the delivery time of call back number and cell site location (Phase I E911 location information)--which will be delivered prior to Phase II location information--may vary from PSAP to PSAP depending on the interaction of Nextel's Phase II set up with

Nextel also has spent considerable time and effort validating the Phase II service requests it has received. Given the limited time between completing testing in late August (as currently scheduled) and October 1, 2002, Nextel will operate on an aggressive rollout schedule to deploy all Phase II-ready PSAPs that have made a valid and timely request. Nextel, therefore, has evaluated its network rollout schedule in relation to its valid Phase II PSAP requests. The rollout schedule evaluation included comprehensively identifying all milestones necessary to ensure timely software deployment, Emergency Services Routing Key ("ESRK") loads,[14] translation modifications and interconnectivity with the PSAP. Nextel is dedicating network resources to implement the upgrades first in those areas where valid PSAP requests were received and Nextel personnel are coordinating with PSAPs to work toward timely deployment. Final validation of Phase II service will occur through PSAP testing using Beta versions of Nextel's A-GPS handsets.

In addition to the existing voice routing path used for basic and Phase I E911, Phase II E911 requires a different delivery path for transmission of location information to the PSAP. Nextel is finalizing a sampling methodology to verify ESRK delivery to the PSAP on this different delivery path and to verify that correct location information accompanies transmission of the ESRK. Moreover, Nextel is working with Technocom, its third-party consultant that will conduct Nextel's accuracy testing, to finalize test plans

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the PSAP's particular equipment and the LEC's chosen interface and solution. Nextel currently is analyzing and pursing alternatives to minimize the delivery time of Phase I location information to all PSAPs that have implemented Nextel's Phase II solution.

[14] An ESRK is a pseudo Automatic Number Identification ("P-ANI") that facilitates transfer of location information to a PSAP.

prior to launch. Nextel anticipates completing this accuracy testing by early September in its Washington, D.C. and/or Virginia markets.

Handsets

As in its May 1, 2002 Report, Nextel has no information to report on specific benchmark dates because its first implementation date is October 1, 2002. For the same reason, Nextel has no "information on [] current handset models being activated or sold" or "important events affecting location-capable handset penetration levels, such as the introduction of new handset models."[15]

Nextel continues to work closely with Motorola, its sole supplier of handsets, and is on schedule to begin selling and activating its first A-GPS capable handset on October 1, 2002. Motorola delivered Alpha II handsets to Nextel in early June and Nextel conducted Alpha II testing from that time through mid-July. Nextel's testing included end-to-end latency, accuracy, time-to-first-fix, code plug settings and general performance against the handset system design. Additionally, Nextel used the Alpha II handsets to make field calls using simulated assist data in mid-June on Motorola's test network at its Plantation, Florida laboratory,[16] and in mid-July Nextel performed Alpha II accuracy testing that included PSAP simulators.

Using the Alpha II test data, Motorola is working to optimize both the accuracy and time-to-first-fix capabilities, and fine-tuning the A-GPS handset into the Beta version. Motorola delivered its first shipment of Beta handsets to Nextel on July 30th.[17]

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[15] *See* Nextel Waiver Order at para. 32.

[16] These test calls did not include transmission of location data to a PSAP or to a PSAP simulator.

[17] Motorola will follow this first shipment with additional shipments of Beta handsets that will be used to support final testing with PSAPs as Nextel begins to roll out Phase II in various markets.

Motorola is expected to deliver upgraded software for these first Beta handsets on August 2nd. Nextel and Technocom will begin accuracy testing of the Beta handset, using simulators in Nextel's Washington, D.C. market area, to validate its performance in a live network environment. Nextel anticipates making approximately 1,500 fixes in various geographic environments throughout the Washington, D.C. area during this Beta handset test.

Concurrent with Beta handset testing, however, Nextel began validating its live network operations with a PSAP in York County, Virginia. This live network testing, referred to as the First Office Application ("FOA"), uses the live network equipped with all necessary Phase II equipment, infrastructure and software upgrades to transmit location information to a live PSAP. The testing is ongoing as this report is filed. Initial attempts to place calls to the York County PSAP, while successfully transmitting the voice, have failed to properly transmit location data to the PSAP. Nextel is working with the PSAP, the LEC and Nextel's database vendor, Intrado, to determine the root cause of the data transmission issue. Correcting this interconnectivity issue is necessary to fully test the end-to-end capabilities of Nextel's Phase II solution with a live PSAP in a live network. Assuming that this issue does not result in significant delay and no other unexpected delays are encountered, Nextel anticipates that the FOA test will be concluded in early August.

Phase I and II E911 Requests

With respect to the Commission's requirement that Nextel provide "information on all pending Phase I and Phase II requests,"[18] Nextel Partners has attached exhibits

[18] *See* Nextel Waiver Order at para. 32.

listing all pending requests and their current status. Nextel Partners has fully deployed Phase I E911 service in 434 PSAP areas.[19] Exhibit A addresses Nextel Partners ongoing Phase I deployment efforts, providing a list of every pending Phase I request, the name of the PSAP, the date of the request, whether or not the request is valid, its status, an explanation of the delay if the request is older than six months, and an anticipated Phase I launch date.[20]

With regard to Exhibit A, Nextel Partners reiterates herein that deployment of Phase I E911 continues to be complicated by a number of factors – many of which are outside of Nextel Partners control. As Nextel outlined in its May 18, 2001 letter to the Wireless Telecommunications Bureau,[21] there are essentially five stages of Phase I deployment and issues that arise in any of these areas can cause delay in the deployment effort. The five stages are:

(1) Data Collection – Nextel collects from the PSAP and Local Exchange Carrier ("LEC") the information necessary to understand the equipment used by the PSAP and LEC, the capacity of the particular 911 system, and the location of certain equipment (e.g., Selective Routers, dispatch centers), among other things.

(2) Network Recommendation – Based on the data collected, Nextel determines how it will route calls to the Selective Router(s), e.g., how many trunks will be needed based on the number of Selective Routers, which MSC (or

[19] One PSAP listed in the May 2002 Exhibit A has been dropped from Exhibit A herein because, upon further investigation, Nextel concluded that it does not provide service in that PSAP area. Therefore, that PSAP should not have been included in the May 2002 Exhibit A. *See* Exhibit C. Additionally, six PSAPs that were inadvertently omitted from the May 2002 Report have been added to Exhibit A.

[20] Thirty-four PSAP's from Exhibit A which were categorized with a projected deployment date in Nextel's May 2002 report are now categorized as To Be Determined ("TBD"). The reclassification results from the inability of the relevant LEC or PSAP to provide Nextel a specific date on which a required component necessary for Phase I deployment will be available. Previously Nextel had estimated a projection date under the assumption that timely information would be forthcoming. Nextel is working with each of these PSAPs and is committed to establishing a projected deployment date as soon as the necessary information is provided. Additional comments specific to each PSAP are provided on Exhibit A.

[21] Letter to Kris Monteith, Chief, Policy Division, Wireless Telecommunications Bureau, from Lawrence R. Krevor, Vice President-Government Affairs, May 18, 2001.

"switch") will be routed to each Selective Router and the trunking capacity needed for each Selective Router based on load analyses.

(3) Routing Decisions/Awaiting Trunk Orders – Using the information collected in the first two phases, Nextel places trunk orders with the LEC. Trunk delivery typically requires 30 to 60, and sometimes 90, days. Once delivered, the trunks are tested. If for any reason the trunks fail the testing process, Nextel is typically required by the LEC to start over – adding an additional 30, 60 or 90 days to the trunk deployment process.

During this time, Nextel and the affected PSAP(s) map out the routing of all 911 calls in the area, ensuring that every 911 call from every Nextel cell site or cell sector is transmitted to a predetermined PSAP. Where multiple PSAPs are involved, or in areas on the border of adjacent PSAPs, this process often requires substantial time, cooperation and joint efforts by all parties.

(4) ALI Database Load – Nextel assigns each cell site (or cell sector) a pseudo ANI ("P-ANI") (a ten-digit telephone number that identifies that particular cell site or sector), and then loads that information into the LEC's ALI database. This, too, requires input and cooperation from both the LEC and PSAP to ensure the information is loaded correctly to display on the PSAP's computer terminals in the requested format.

(5) Carrier Test – This is the final stage of Phase I deployment, ensuring that the 20 digits are transmitted to the correct PSAP and displayed appropriately on the PSAP dispatcher's screen. Testing must be conducted in coordination with each PSAP to avoid burdening the PSAP during busy times and to preclude inadvertent false calls.

In Exhibit A some of the listed Phase I requests are more than six months old. For each of those requests, Nextel Partners includes an explanation of the delay based on the five stages listed above.

Exhibit B addresses Nextel Partners ongoing Phase II deployment efforts, providing a list of every pending Phase II request, the name of the PSAP, the date of the request, whether or not the request is valid, its status, an explanation of the delay if the status is on hold and an anticipated Phase II launch date. [22]

[22] Nextel notes that the proposed deployment dates in Exhibit A and in Exhibit B are targeted launch dates, which Nextel and the relevant PSAP are striving to meet. Nextel is in regular contact with each of these PSAPs and is working to deploy Phase I and Phase II E911 as soon as possible.

Nextel Partners has received 118 initial Phase II requests and has asked that each of these PSAPs provide the documentation required in the *Richardson Order* for determining the request's validity.[23] Nextel Partners' determination that a PSAP request is "valid" presumes that all required LEC and PSAP infrastructure and upgrades—if not already in place—will be installed and ready for operation prior to October 1, 2002.[24] Nextel Partners has communicated frequently with these PSAPs and, as previously noted herein, has established an aggressive plan to deliver Phase II service to these PSAPs, located in various areas throughout the United States, between late August and the end of September. Moreover, Nextel Partners has prioritized all of its other valid Phase II PSAP requests received after April 1, 2002 and is working with these PSAPs to deploy Phase II service within six months after receiving a valid request.

With regard to Exhibit B, similar to Exhibit A, Phase II deployment continues to be complicated by a number of factors – many of which are outside of Nextel Partners' control.[25] There are essentially four stages of Phase II deployment and issues that arise in any of these areas can cause delay in the deployment effort. The four stages are:

(1) Data Collection – Nextel collects from the LEC the information necessary to understand the equipment used by the PSAP and LEC, the capacity of the particular 911 system, the location of certain equipment (e.g., Selective

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[23] *In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson,* Order, CC Docket No. 94-102, FCC 01-293, released October 17, 2001 at paras. 14-16 ("*Richardson Order*").

[24] "Prior to October 1, 2002" requires sufficient time before that date to allow Nextel to interconnect with the LEC/PSAP facilities and to test Phase II delivery prior to October 1, 2002.

[25] Deployment of Phase I and Phase II will be coordinated where possible; however, the two phases are not contingent on each other. If a PSAP requesting Phase II deployment is already Phase I, Nextel will not replicate Phase I redundant testing before deploying Phase II.

Routers, dispatch centers), a validity check, ESRK schedule, and points of contact, among other things. [26]

(2) Implementation Planning – Based on the data collected, Nextel works with the PSAP to determine mutually agreeable testing dates, modifies existing software, and tests cutovers from Basic to Phase II or Phase I to Phase II, among other things.

(3) Wireless National ALI Database – Update and load information into the LEC's ALI database to associate the caller with the appropriate PSAP via an ESRK. This, too, requires input and cooperation from the LEC, PSAP and Nextel's vendor to ensure the information is loaded correctly for delivery to PSAP's computer terminals.[27]

(4) Carrier Test – This is the final stage of Phase II deployment, ensuring that the 10-digit call back number and location information are transmitted to the correct PSAP and displayed on the PSAP dispatcher's screen. Testing must be conducted in coordination with each PSAP to avoid burdening the PSAP during busy times and to preclude inadvertent false calls.

CONCLUSION

As required in the Nextel Waiver Order,[28] Nextel Partners is providing this Quarterly Report to the Executive Directors and counsel of the Association of Public Safety Communications Officials-International, Inc. ("APCO"), the National Emergency Number Association ("NENA") and the National Association of State Nine One One Administrators ("NASNA"). Should any of these organizations or their individual PSAP

[26] Other issues with LECs also can impact deployment of Phase II service. For example, during the week of July 15, 2002 Nextel was told that BellSouth would not upgrade for Phase II E911 service until Nextel agreed to pay BellSouth $.63 per each "rebid" by a Phase II PSAP. A PSAP may rebid two, three or even four times or more per every 911 call. A PSAP's decision to request updated Phase II location information is outside of Nextel's control and is essentially unrelated to Nextel's obligation to provide Phase II E911. BellSouth's attempt to leverage the Commission's wireless E911 Phase II requirement to assess wireless carriers for PSAP rebids is inconsistent with the Commission's decision in *King County* and, therefore, unacceptable to Nextel. If BellSouth continues to take this position, timely deployment of Nextel's Phase II service to PSAPs in BellSouth's region may be in jeopardy.

[27] Additionally, it appears that not all LECs are planning to use ESRKs to route location information. Adjusting Nextel's interconnectivity to support the use of ESRDs could create complications and delay deployment.

[28] Nextel Waiver Order at para. 32.

members have questions or concerns about Nextel Partners' submission, Nextel Partners encourages them to contact Brent Eilefson, at the number listed below, as soon as possible to ensure rapid and efficient deployment of Nextel Partners' Phase I and Phase II E911 services.

Respectfully submitted,
Nextel Partners, Inc.

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